



**HELEN F. DALTON & ASSOCIATES, P.C.**  
ATTORNEYS AT LAW

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80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415

Tel. (718) 263-9591 Fax. (718) 263-9598

May 18, 2023

**Via ECF**

The Honorable District Judge Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: **Sanchez v. Cosan Construction Corp., et al.**  
**22-CV-8420 (KMK)**

Dear Judge Karas:

Our office represents the Plaintiffs in the above-referenced matter and submit this motion jointly with Defendants to respectfully request an extension of time to file the parties' settlement papers due to the Court on May 18, 2023.

The parties are still in the process of drafting and finalizing the settlement papers to be submitted to the Court. As such, we kindly ask that the time to file be extended to June 7, 2023. This is the first request for an extension of the deadline to file the settlement papers and this request will not affect any other dates or deadlines.

We thank the Court for its consideration and remain available to provide any additional information.

Respectfully submitted,

*James O'Donnell*  
James O'Donnell, Esq.

**CC (via e-mail):**

Jason R. Finkelstein, Esq.  
Cole Schotz, P.C.  
[jfinkelstein@coleschotz.com](mailto:jfinkelstein@coleschotz.com)